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DECLARATION OF PAUL MORANTZ

I, PAUL MORANTZ, do hereby declare as follows:

I am over the age of eighteen and if called to the stand and sworn under oath I could competently testify as follows:

1. I am the attorney for Bent Corydon in Judicial Council Coordination Proceeding No. 2151 relating to the cases of Jentzsch v. Corydon, Case No. NVC 14274, and Carmichael v. Corydon, Case No. 189 414. Each of these cases is a defamation case brought by a Scientologist claiming to be a President of a Scientology corporation against Mr. Corydon.

2. In addition, Mr. Corydon is a defendant in two other Scientology cases. In one, in Riverside, California, the Church of Scientology is suing for possession of property that Mr. Corydon's local congregation has following its splintering from the Church of Scientology. In said case, Mr. Corydon has cross-complained, including a cause of action for damages arising out of the use of Scientology's "fair game" (harassment) policies, Church of Scientology v. Corydon, case no. 154129. Mr. Corydon is also a defendant in a third defamation action brought by the Church of Scientology that is pending in the District of Columbia, Church of Scientology International v. Corydon, Case No. CA 8048-87.

3. Attached hereto as Exh. A is a copy of the Honorable Judge Paul Breckenridge's decision in the herein case making a finding that fair game existed and that Scientology took actions to harass its enemies. This is a key issue as it related to each of the above described actions. Thus, obtaining a certified copy of said judgment may become necessary for collateral estoppel

1 purposes. We attempted to obtain a certified copy but the clerk
2 has advised us that there is a sealing order on the file.

3 4. It is germane to each of the above described cases to
4 be able to show that necessary relevant information and records
5 in possession of the Church of Scientology and its Presidents
6 were knowingly destroyed in order to prevent production in
7 similar litigation.

8 5. Attached hereto is the declaration of former
9 Scientology official, Vicki Aznaran, indicating that Scientology
10 intentionally destroyed documents sought in this herein case, and
11 others. To prove the validity of her testimony, we wish to
12 inspect the file and learn what orders for production of
13 documents had in fact been made by Judge Breckenridge.

14 6. Scientologist Heber Jentsch claims in his defamation
15 action that Defendant Corydon wrongfully called him a liar.

16 7. One of the basis for Mr. Corydon's opinions concerning
17 Mr. Jentsch is that following Judge Breckenridge's decision in
18 the herein case, when questioned concerning the same on a BBC
19 Broadcast, Mr. Jentsch suggested that the Judge Breckenridge
20 decision was "Nazi" influenced. A true and correct transcript of
21 Mr. Jentsch's quote is attached as Exh. B. On the same BBC
22 program, Mr. Jentsch also stated that it can be verified in
23 every court of law in the world that Scientology does not use
24 private information taken from its followers confidential folders
25 and disseminate them as blackmail. As can be seen from Exh. A,
26 Judge Breckenridge made a specific finding that Scientology does.
27 Mr. Jentsch's false statement that every court of law has held
28 that they do not is attached as Exh. C.

